

Ronald G. Rios
County Commissioner Director

Shanti Narra
County Commissioner Deputy Director

Claribel A. Azcona-Barber
Charles Kenny
Leslie Koppel
Chanelle Scott McCullum
Charles E. Tomaro
County Commissioners



Ronald G. Rios
Chairperson, County Administration

John A. Pulomena
County Administrator

Thomas F. Kelso, Esq.
County Counsel

COUNTY ADMINISTRATION
Office of the County Counsel

April 1, 2024

VIA ELECTRONIC FILING

The Honorable Zahid N. Quraishi, U.S.D.J.
United States District Court
Clarkson S. Fisher Building
402 East State Street
Trenton, New Jersey 08608

Re: Andy Kim, et al. v. Hanlon, et al.
Civil Action No.: 3:24-CV-01098 (ZNQ)(TJB)

Dear Judge Quraishi:

This office is counsel to the Defendant, Middlesex County Clerk, Nancy J. Pinkin, sued in her official capacity as Middlesex County Clerk. Please accept this brief in lieu of a more formal submission, seeking to join in the Defendants County Clerks' motion to seek an emergency stay (Docket Entry No. 198) of the Court's Order (Docket Entry No. 195) pursuant to Fed. R. Civ. P. 62(c)(1) and L. Civ. R. 65.1(d).

The Middlesex County Defendant wishes to bring to the Court's attention that from the inception of the Defendants' joint application seeking an emergent stay, it was intended that the letter filed on Friday on behalf of all the County Clerks (Docket Entry No. 198) was to also include Middlesex County. We have had an opportunity to review Plaintiffs submission and Opposition to the Motion seeking an emergency stay. The Plaintiffs Memorandum of



The Hon. Zahid N. Quraishi, U.S.D.J.

April 1, 2024

Page 2

Law seeks to suggest otherwise, but to be clear, Middlesex County joins in the submission provided on Friday, March 29, 2024 seeking an emergency stay of the Court's Order. (Docket Entry No. 195) pursuant to Fed. R. Civ. P. 62(c)(1) and L. Civ. R. 65.1(d).

Respectfully submitted,



By: MICHAEL S. WILLIAMS, ESQ.
Deputy County Counsel

cc: All counsel of record (via electronic filing)

